



## **City of East Chicago Soil Removal and Drinking Water Service Line Replacement Coordination Plan**

The United State Environmental Protection Agency (EPA), the Indiana Department of Environmental Management (IDEM), The Indiana Finance Authority (IFA), and the City of East Chicago are undertaking concurrent projects designed to protect the health and wellbeing of residents of East Chicago located in "Zone 2" and "Zone 3" as depicted in the attached map. Zone 2 and Zone 3 are located within the U.S. Smelter and Lead Refinery, Inc. Superfund Site ("the Site"). This Coordination Plan pertains only to Zones 2 and 3. It does not address work undertaken outside Zone 2 or Zone 3 by any of the parties to this document. This Coordination Plan is intended to reflect roles of the parties, describe the timing of actions, and set forth a plan for overall coordination of work within Zone 2 and Zone 3. The Coordination Plan is a statement of intention. It does not replace requirements to obtain appropriate permits, if any, and it does not create any rights nor is it enforceable by any of the parties or by persons not party to this Coordination Plan.

### **A. Parties**

#### **U.S. EPA**

The U.S. EPA is the lead agency on this site. EPA contractors are undertaking an action in Zone 2 and Zone 3 to implement the remedy set forth in the Record of Decision (ROD) for the Site issued on November 30, 2012. The remedy calls for the removal of soils from yards in Zone 2 and Zone 3 that are above action levels for arsenic and lead to a depth of 24 inches below ground surface (bgs). In some instances, EPA may remove soils at a depth of greater than 24 inches bgs.

Contacts for EPA:

Jacob Hassan (Zone 2) (312) 886-6864 [hassan.jacob@epa.gov](mailto:hassan.jacob@epa.gov)

Tim Drexler (Zone 3) (312) 353-4367 [drexler.timothy@epa.gov](mailto:drexler.timothy@epa.gov)

Janet Pope (Community Involvement Coordinator) (312) 353-0628 [pope.janet@epa.gov](mailto:pope.janet@epa.gov)

Charles Rodriguez (CIC) (312) 886-7472 [rodriguez.charles@epa.gov](mailto:rodriguez.charles@epa.gov)

Steven Kaiser (Office of Regional Counsel) (312) 353-3804 [kaiser.steven@epa.gov](mailto:kaiser.steven@epa.gov)

Leo Chingcuanco (Office of Regional Counsel) (312) 886-7236 [chingcuanco.leonard@epa.gov](mailto:chingcuanco.leonard@epa.gov)

#### **IDEM**

The Indiana Department of Environmental Management (IDEM) is a supporting agency to EPA for the Superfund action at the Site.

The IDEM Office of Water Quality is making drinking water filters along with 2 additional replacement filters available for all residents in Zones 2 and 3. IDEM's contractor \_\_\_\_\_ began to implement this scope of work on April 10, 2017, and expects to complete the installation of water filters at all residents in Zones 2 and 3 by April 30, 2017.

Contacts for IDEM:

IDEM general point of contact: Beth Admire, [badmire@idem.in.gov](mailto:badmire@idem.in.gov), (317) 232-8584

Matt Prater, Drinking Water Section Chief (info)

Doug Petroff, Office of Land Quality (info)

#### **IFA**

The Indian Finance Authority (IFA) is providing \$3 million to the City of East Chicago to fund drinking water service line replacement in Zones 2 and 3.

IFA point of contact: Jim McGoff, [jmcgoff@ifa.in.gov](mailto:jmcgoff@ifa.in.gov), (317) 233-4337

#### **East Chicago**

The City of East Chicago's contractor for drinking water service line replacement in Zones 2 and 3 is \_\_\_\_\_. \_\_\_\_\_ will be responsible for removing the current line from home to street or lining the current line from home to street [this can be pulled out of the sow].

#### **B. *The Project***

The parties recognize that the EPA soil removal project and the East Chicago drinking water service line replacement project are two separate projects. The Parties intend to coordinate work on these two projects to the extent feasible to minimize the inconvenience to the residents of East Chicago. EPA resumed work on its project on April 5, 2017, and will commence excavations on April 17, 2017. The City's project will begin on \_\_\_\_\_.

#### **C. *Action Items***

The parties recognize that not all residences in Zones 2 and 3 will require excavation for both superfund soil removal and drinking water service line replacement. At the residences identified in the attached document [can we provide a depiction?], coordination will be as follows:

1. EPA's contractor and the City's contractor will secure separate access agreements from property owners for their respective work.
2. EPA will give the City's contractor [time] notice before beginning work on a property.
3. EPA's contractor will remove soil in accordance with the ROD, subsequently developed design drawings, and decisions in the field. If contamination exists below the bottom of EPA's excavation in an area where EPA expects the City will perform line work, EPA will install a visual barrier so that the City's contractor will know that it is encountering soil that may contain elevated levels of lead or arsenic.
4. EPA will place clean fill in the excavated area and notify the City contact that it has completed excavation and backfilling.
5. Within \_\_\_\_\_[time] the City's contractor will undertake its drinking water service line replacement project. In doing so, it will ensure the designated clean fill is separated from other excavated material.
6. After the City has either replaced the drinking water lateral lines or lined the interior of these lines, it will return the property to the same condition it was in when EPA's contractors paused their work. It will then notify EPA's contact and EPA will complete restoration work on the excavated property.

7. If the City's contractor does not complete [or undertake?] its service line project within [time], EPA will complete restoration work on the excavated property.
8. If EPA finds that the City's contractor has not restored the property to the same condition it was in when EPA's contractors paused their work, EPA shall [what?].
9. The City shall manage and dispose of any contaminated material excavated by the City's contractor [from a residential yard]. The City shall also manage and dispose of other materials that cannot be returned to the property.
10. The parties will work together to coordinate public meetings and outreach to the residents.
11. Each party will prepare its own Fact sheets in English and Spanish to explain its portion of the work.
12. Any other timing issues?

EPA's command unit is located at Carrie Gosch Elementary School. All City contractors will check in with the Site Commander at the beginning of each day.

Emergency issues will be reported in the following manner to the EPA Site Commander.

***D. Effective Date and Termination***

This Coordination Plan is in effect from x date until the parties terminate it by \_\_\_\_\_.

***E. Dispute Resolution***

Placeholder for discussion.

Is this going to be signed? If so, by whom?

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### **A. *Parties***

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The IDEM Office of Water Quality is making available for all residents in Zones 2 and 3 drinking water filters along with 2 additional replacement filters.

Contacts for IDEM:

Beth Admire, [badmire@idem.in.gov](mailto:badmire@idem.in.gov), (317) 232-8584 Office of Legal Counsel

Matt Prater, [MPrater@idem.IN.gov](mailto:MPrater@idem.IN.gov), (317)-234-7437 Office of Water Quality

Doug Petroff, [DPetroff@idem.IN.gov](mailto:DPetroff@idem.IN.gov) (317)-234-7179) Office of Land Quality

Mary Hollingsworth, [MHolling@idem.IN.gov](mailto:MHolling@idem.IN.gov) (317)-232-8741 Office of Water Quality

Lisa McCoy, [LMcCoy@idem.IN.gov](mailto:LMcCoy@idem.IN.gov) (317)-233-2355 Office of Legal Counsel

Anne Remek, [AREMEK@idem.IN.gov](mailto:AREMEK@idem.IN.gov) (317)-233-0447 Natural Resource Damages Program

#### **IFA**

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IFA point of contact: Jim McGoff, [jmcgoff@ifa.in.gov](mailto:jmcgoff@ifa.in.gov), (317) 233-4337

#### **East Chicago**

The City is completing plans and specifications for the service line replacement project, will seek proposals from qualified contractors, and award a contract for the project as soon as practicable as required in I.C. 36-1-12-4(b). Contact information of the Contractor selected will be promptly distributed to the persons identified in the Coordination Plan. The replacement service line will be installed by directional boring from the building's basement, or if no basement (slab), from a small excavation made at the foundation wall. There will be a corresponding small excavation in the street at the water main to allow the connection of the new line.

Contacts for East Chicago:

**William Allen, [Wallen@eastchicago.com](mailto:Wallen@eastchicago.com) (219)-391-8355, City Engineer**

**Abdul Zehraoui, [azehraoui@eastchicago.com](mailto:azehraoui@eastchicago.com) (219)-391-8790, Utility Director**

**Joseph Allegretti, [joe@joeallegretti.com](mailto:joe@joeallegretti.com) (219)-836-0222, Corporation Counsel**

### **B. *The Project***

#### **EPA**

EPA will continue remediation work at priority properties in Zone 2 on April 17, 2017. EPA expects to complete work at approximately 72 residences in Zone 2 in 2017.

EPA will continue remediation work in Zone 3 on or about May 1, 2017. EPA expects to complete work at approximately 120 residences in Zone 3 in 2017.

#### **IDEM**

IDEM began to implement this scope of work on April 11, 2017, and expects to complete the installation of water filters for all residents in Zones 2 and 3 by April 30, 2017. IDEM will collect 30 lead and copper verification samples starting the week of week of April 17 and complete the sampling the first week of May. Theses samples will be collected at the same location that East Chicago sampled in 2016 and in accordance with the Lead and Copper Rule.

In addition IDEM will also collect orthophosphate samples at these 30 sites.

### **East Chicago**

East Chicago will replace lateral service lines at 17 properties in Zone 2 and 37 properties in Zone 3 where EPA has already completed remediation work, and will replace lateral service lines at other properties as EPA completes remediation work in Zones 2 and 3. East Chicago will also replace lateral service lines at properties in Zones 2 and 3 where no remediation work is necessary.

### ***C. Information Sharing Plan***

EPA will share information with East Chicago to facilitate the efficient completion of the lead service line replacement project. Such information includes maps that depict where remediation work is planned and where it has been completed; information about property ownership to facilitate the securing of access agreements; and information about the structure of the residences that will assist East Chicago in selecting the proper LSL replacement method.

As site commander, EPA will always be the primary point of contact for questions that arise as work is completed by site contractors from all parties to this agreement.

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1. EPA will identify which properties require remediation in the front yard.
2. EPA's contractor and the City's contractor will secure separate access agreements from property owners for their respective work.
3. EPA will give the City's contractor [time] notice before beginning work on a property.
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This Coordination Plan may be modified with the written agreement of all Parties.

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